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30" & 24" Boring Pumps Installed

SETZER BROTHERS, INC.

Well Drilling and Boring

RT. 2, BOX 317 • CLAREMONT, N. C. 28610
WILLIE SETZER **(704)** 241.2734 CATAWBA, N. C.

September 28, 1993

FHWA Docket NO. 92-35 Federal Highway Administration Room 4232, HCC-10 400 Seventh Street, S.W. Washington, D.C. 20590 7845 QA DIV.

Dear Sir:

FHWA-97-2186-57

My name is Stanley Setzer, President of Setzer Brothers, Inc., located in Catawba, North Carolina. We install water wells, monitoring holes, foundation holes, and install pump equipment. We have been in business since 1938. At the present time, we are operating two to four pieces of drilling equipment plus support trucks. We do work for private homes, farms, industries, and small communities.

Fifty percent of our jobs are located within ten mile radius of our office, forty percent are located within twenty miles, and ten percent are within forty miles.

We are only operating two drilling rigs a day due to lack of operators with CDL's. CDL requirements have made it hard on our company because of the many over the road trucking companies in our area. They must have a large driver turnover because most are always looking for drivers and offering equal or better pay with less physical work. Also you could say working conditions are better because most trucks have heating and air conditioning in their trucks. Well drillers spend seven out of eight hours a day in the outdoors — outside the truck. Drivers are only on the highway an average of one out of eight hours per day. The other time is spent at the job site. We travel low traffic road in rural areas most of the time. Our drilling rigs are slow—moving with a top end speed of 55 MPH. North Carolina has had a safety inspection for all car and trucks in place for many years.

Also, I would like to point out that it takes an average of one year to train drill operators. We go the the expense of paying for the employees physical examination and cost of the CDL license only to have the employee leave to work for a larger trucking company. We have already lost two employees this summer.

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This trend has made it very hard on the few remaining workers, and created a substanial loss for the company financially. Due to the lack of qualified, experienced drill operators we have had to turn away fifty percent of work available to us.

Our newest drilling rig is six years old. After these past six years, the rig has only 21,000 miles on it with 7,500 hours of rig time. That is about 3,500 miles per year and that's including the miles for the factory (Garland, Texas) to dealer (Roanoke, Virginia) to us. Also, this rig has been used every day since delivery (weather permitting).

It is our understanding that the Transportation Research Board has reported that the current bridge formula is unnecessarily restrictive when applied to mobile equipment such as drilling rigs and their support trucks. We have to agree with this statement simply because some of our rigs have problems complying with the current bridge formula and axle weight require ments because of the short wheelbases needed to maneuver safely at residential homes and construction sites.

I would like to point out that in thirty-eight stateswater well drilling rigs and their support trucks are not considered as commercial motor vehicles and most of these vehicles operate under conditions similar to farm vehicles.

Our company would like the Federal Highway Administration to relieve us of this costly and unnecessary burden. We feel that this would in no way affect highway safety. Our employees drive more miles to and from work each week then they do while at work.

Thank you,

Stanley K. Setzer

President, Setzer Brothers, Inc.

Starley K. Setzer

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